



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

July 31, 2003

100 North Senate Avenue  
P. O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.IN.gov/idem](http://www.IN.gov/idem)

TO: Interested Parties / Applicant

RE: Bison Manufacturing, Inc.

MSOP 039-16808-00081

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within (18) eighteen days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) the date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for consideration at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosure

FNPER.wpd 8/21/02



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## MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

**Bison Manufacturing, Inc.**  
**71913 CR 23**  
**New Paris, Indiana 46553**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-2, (Prevention of Significant Deterioration), with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-16808-00081	
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: July 31, 2003  Expiration Date: July 31, 2008

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

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The Permittee owns and operates a stationary livestock superstructure manufacturing source.

Authorized Individual:	Operations Manager
Source Address:	71913 CR 23, New Paris, Indiana 46553
Mailing Address:	71913 CR 23, New Paris, Indiana 46553
General Source Phone:	(574) 831-6800
SIC Code:	3715, 3799
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules;

### A.2 Emissions Units and Pollution Control Equipment Summary

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This stationary source is approved to operate the following emissions units and pollution control devices:

- (a) Three (3) surface coating operations, two (2) identified as Old Paint Room and one (1) identified as New Paint Room, equipped with dry filters for particulate control and high volume low pressure (HVLP) and airless spray guns, exhausting to Stacks OPR 1, OPR 2 and NPR, capacity: thirty-five (35) metal trailer superstructures per week (0.2083 superstructures per hour), total.
- (b) One (1) assembly area, identified as A1, equipped with extrusion guns used for application of sealants and adhesives, exhausting to the general ventilation system, capacity: thirty-five (35) painted metal trailer superstructures per week (0.2083 superstructures per hour).
- (c) One (1) petroleum fuel (#2 Distillate) storage tank, identified as #2 Tank, constructed in 2003, capacity: two hundred and fifty (250) gallons.
- (d) One (1) gasoline storage tank, identified as Gas 1, constructed in 1992, capacity: two hundred and fifty (250) gallons.
- (e) Source-wide natural gas-fired combustion units rated at 2.975 million British thermal units per hour, consisting of:
  - (1) Thirteen (13) space heaters, constructed in 1992, rated at 0.075 million British thermal units per hour, each.
  - (2) One (1) forced air unit, constructed in 1998, rated at 0.100 million British thermal units per hour.
  - (3) One (1) air make up unit, constructed in 1992, rated at 1.90 million British thermal units per hour.

- (f) One (1) sawing, shearing and bending facility identified as FAB 1, using cutting coolant.
- (g) Twenty (20) Metal Inert Gas (MIG) welding stations, identified as Weld 1, capacity: 1.46 pounds of wire per station.
- (h) Paved and unpaved roads and parking lots with public access.

## **SECTION B GENERAL CONDITIONS**

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1.1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

### **B.1 Permit No Defense [IC 13]**

This permit to operate does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

### **B.2 Definitions**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations IC 13-11, 326 IAC 1-2, and 326 IAC 2-1.1-1 shall prevail.

### **B.3 Effective Date of the Permit [IC13-15-5-3]**

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

### **B.4 Permit Term and Renewal [326 IAC 2-6.1-7(a)] [326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

### **B.5 Modification to Permit [326 IAC 2]**

All requirements and conditions of this operating permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

### **B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]**

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality  
Indiana Department of Environmental Management  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

**B.7 Preventive Maintenance Plan [326 IAC 1-6-3]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within ninety (90) days after issuance of this permit, including the following information on each emissions unit:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
- (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall implement the PMPs, including ant required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMP's shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).



- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]**

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- (a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
  
Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.
- (c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.9 Inspection and Entry [326 IAC 2-5.1-3(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)] [IC 13-14-2-2] [IC 13-30-3-1]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, when applicable) U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

- (a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.
- (b) The written notification shall be sufficient to transfer the permit to the new owner by an notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).
- (c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.
- (b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

<b>Entire Source</b>
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**C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

**C.2 Permit Revocation [326 IAC 2-1.1-9]**

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to operate may be revoked for any of the following causes:

- (a) Violation of any conditions of this permit.
- (b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.
- (c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.
- (d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.
- (e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

**C.3 Opacity [326 IAC 5-1]**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Fugitive Dust Emissions [326 IAC 6-4]**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.5 Stack Height [326 IAC 1-7]**

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted by using good engineering practices (GEP) pursuant to 326 IAC 1-7-3.

C.6 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

- (f) Demolition and renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

- (g) Indiana Accredited Asbestos Inspector  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

## Testing Requirements

### C.7 Performance Testing [326 IAC 3-6]

- (a) Compliance testing on new emissions units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual date.
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

## Compliance Requirements [326 IAC 2-1.1-11]

### C.8 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

## Compliance Monitoring Requirements

### C.9 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented when operation begins.

### C.10 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

**C.11 Compliance Response Plan - Preparation and Implementation**

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- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ, upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:
  - (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.
  - (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan, the Permittee shall amend its Compliance Response Plan to include such response steps taken.
- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:
  - (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
  - (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
  - (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.
  - (4) Failure to take reasonable response steps shall be considered a deviation from the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
  - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for a minor permit modification to the permit, and such request has not been denied.
  - (3) An automatic measurement was taken when the process was not operating.
  - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

**C.12 Actions Related to Noncompliance Demonstrated by a Stack Test**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected emissions unit while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

**Record Keeping and Reporting Requirements**

**C.13 Malfunctions Report [326 IAC 1-6-2]**

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Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

- (a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.
- (b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.
- (c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).
- (d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

**C.14 Emission Statement [326 IAC 2-6]**

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- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
  - (1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

- (2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1(32) "Regulated pollutant which is used only for purposes of Section 19 of this rule") from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:  
  
Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.15 General Record Keeping Requirements [326 IAC 2-6.1-5]

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.16 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

- (a) Reports required by conditions in Section D of this permit shall be submitted to:  
  
Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.



## SECTION D.1 FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Surface Coating Operations

- (a) Three (3) surface coating operations, two (2) identified as Old Paint Room and one (1) identified as New Paint Room, equipped with dry filters for particulate control and high volume low pressure (HVLP) and airless spray guns, exhausting to Stacks OPR 1, OPR 2 and NPR, capacity: thirty-five (35) metal trailer superstructures per week (0.2083 superstructures per hour), total.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D.1.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds per gallon, excluding water, as delivered to the applicator for extreme performance coatings at the Old Paint Room and New Paint Room exhausting to Stacks OPR 1, OPR 2 and NPR.

#### D.1.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the Old Paint Room and New Paint Room during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.1.3 Particulate [326 IAC 6-3-2(d)]

- (a) Particulate from the surface coating shall be controlled by dry particulate filters, and the Permittee shall operate the control device in accordance with manufacturer's specifications.
- (b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:
- (1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
  - (2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
- (c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

#### D.1.4 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

### Compliance Determination Requirements

#### D.1.5 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted

average shall be determined by the following equation:

$$A = [ 3 (C \times U) / 3 U ]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied;  
and U is the usage rate of the coating in gallons per day.

#### **Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]**

##### **D.1.6 Record Keeping Requirements**

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- (a) In order to document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.1.1.
  - (1) The VOC content of each coating material and solvent used less water.
  - (2) The amount of coating material and solvent used on daily basis.
    - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
    - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
  - (3) The volume weighted average VOC content of the coatings used for each day;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]: Assembly

- (b) One (1) assembly area, identified as A1, equipped with extrusion guns used for application of sealants and adhesives, exhausting to the general ventilation system, capacity: thirty-five (35) painted metal trailer superstructures per week (0.2083 superstructures per hour).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards

#### D.2.1 Volatile Organic Compounds (VOC) Limitations [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9, the owner or operator shall not allow the discharge of VOC into the atmosphere in excess of three and five-tenths (3.5) pounds per gallon, excluding water, as delivered to the applicator for extreme performance coatings at the assembly area.

#### D.2.2 Volatile Organic Compound (VOC) Limitations, Clean-up Requirements [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (f), all solvents sprayed from the application equipment of the assembly area during cleanup or color changes shall be directed into containers. Said containers shall be closed as soon as the solvent spraying is complete. In addition, all waste solvent shall be disposed of in such a manner that minimizes evaporation.

#### D.2.3 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### Compliance Determination Requirements

#### D.2.4 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC content limit contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

#### D.2.5 Record Keeping Requirements

- (a) In order to document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (3) below. Records maintained for (1) through (3) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limit established in Condition D.2.1.

(1) The VOC content of each coating material and solvent used less water.

(2) The amount of coating material and solvent used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

- (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvent.
- (3) The volume weighted average VOC content of the coatings used for each day;
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

### SECTION D.3

### FACILITY OPERATION CONDITIONS

**Facility Description [326 IAC 2-7-5(15)]: Miscellaneous Operations**

- (c) One (1) petroleum fuel (#2 Distillate) storage tank, identified as #2 Tank, constructed in 2003, capacity: two hundred and fifty (250) gallons.
- (d) One (1) gasoline storage tank, identified as Gas 1, constructed in 1992, capacity: two hundred and fifty (250) gallons.
- (e) Source-wide natural gas-fired combustion units rated at 2.975 million British thermal units per hour, consisting of:
  - (1) Thirteen (13) space heaters, constructed in 1992, rated at 0.075 million British thermal units per hour, each.
  - (2) One (1) forced air unit, constructed in 1998, rated at 0.100 million British thermal units per hour.
  - (3) One (1) air make up unit, constructed in 1992, rated at 1.90 million British thermal units per hour.
- (f) One (1) sawing, shearing and bending facility identified as FAB 1, using cutting coolant.
- (g) Twenty (20) Metal Inert Gas (MIG) welding stations, identified as Weld 1, capacity: 1.46 pounds of wire per station.
- (h) Paved and unpaved roads and parking lots with public access.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

There are no specific conditions applicable to these facilities.

**MALFUNCTION REPORT**

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
FAX NUMBER - 317 233-5967**

**This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6  
and to qualify for the exemption under 326 IAC 1-6-4.**

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?\_\_\_\_\_, 25 TONS/YEAR SULFUR DIOXIDE ?\_\_\_\_\_, 25 TONS/YEAR NITROGEN OXIDES ?\_\_\_\_\_, 25 TONS/YEAR VOC ?\_\_\_\_\_, 25 TONS/YEAR HYDROGEN SULFIDE ?\_\_\_\_\_, 25 TONS/YEAR TOTAL REDUCED SULFUR ?\_\_\_\_\_, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?\_\_\_\_\_, 25 TONS/YEAR FLUORIDES ?\_\_\_\_\_, 100 TONS/YEAR CARBON MONOXIDE ?\_\_\_\_\_, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?\_\_\_\_\_, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?\_\_\_\_\_, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?\_\_\_\_\_. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION \_\_\_\_\_.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC \_\_\_\_\_ OR, PERMIT CONDITION # \_\_\_\_\_ AND/OR PERMIT LIMIT OF \_\_\_\_\_

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ?    Y        N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ?    Y        N

COMPANY: \_\_\_\_\_ Bison Manufacturing, Inc. \_\_\_\_\_ PHONE NO. : \_\_\_\_\_ (574) 831-6800  
LOCATION: (CITY AND COUNTY) \_\_\_\_\_ New Paris, Elkhart County \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_ 039-16808 \_\_\_\_\_ AFS PLANT ID: \_\_\_\_\_ AFS POINT ID: \_\_\_\_\_ INSP: \_\_\_\_\_  
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON: \_\_\_\_\_

DATE/TIME MALFUNCTION STARTED: \_\_\_\_\_ / \_\_\_\_\_ / 20\_\_\_\_ \_\_\_\_\_ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: \_\_\_\_\_

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE \_\_\_\_\_ / \_\_\_\_\_ / 20\_\_\_\_ \_\_\_\_\_ AM / PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO<sub>2</sub>, VOC, OTHER: \_\_\_\_\_

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: \_\_\_\_\_

MEASURES TAKEN TO MINIMIZE EMISSIONS: \_\_\_\_\_

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL\* SERVICES: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS: \_\_\_\_\_  
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT: \_\_\_\_\_  
INTERIM CONTROL MEASURES: (IF APPLICABLE) \_\_\_\_\_

MALFUNCTION REPORTED BY: \_\_\_\_\_ TITLE: \_\_\_\_\_  
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY: \_\_\_\_\_ DATE: \_\_\_\_\_ TIME: \_\_\_\_\_

**Please note - This form should only be used to report malfunctions  
applicable to Rule 326 IAC 1-6 and to qualify for  
the exemption under 326 IAC 1-6-4.**

**326 IAC 1-6-1 Applicability of rule**

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

**326 IAC 1-2-39 "Malfunction" definition**

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

\* **Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH**

**MINOR SOURCE OPERATING PERMIT  
ANNUAL NOTIFICATION**

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

<b>Company Name:</b>	<b>Bison Manufacturing, Inc.</b>
<b>Address:</b>	<b>71913 CR 23</b>
<b>City:</b>	<b>New Paris, Indiana</b>
<b>Phone #:</b>	<b>(574) 831-6800</b>
<b>MSOP #:</b>	<b>039-16808-00081</b>

I hereby certify that Bison Manufacturing is ☒ still in operation.  
☐ no longer in operation.

I hereby certify that Bison Manufacturing is ☒ in compliance with the requirements of MSOP 039-16808-00081.  
☐ not in compliance with the requirements of MSOP 039-16808-00081.

<b>Authorized Individual (typed):</b>	<b>Dave Willis</b>
<b>Title:</b>	<b>Manager</b>
<b>Signature:</b>	
<b>Date:</b>	

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

<b>Noncompliance:</b>



## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Minor Source Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	<b>Bison Manufacturing, Inc.</b>
<b>Source Location:</b>	<b>71913 CR 23, New Paris, Indiana 46553</b>
<b>County:</b>	<b>Elkhart</b>
<b>SIC Code:</b>	<b>3715, 3799</b>
<b>Operation Permit No.:</b>	<b>MSOP 039-16808-00081</b>
<b>Permit Reviewer:</b>	<b>Mark L. Kramer</b>

The Office of Air Quality (OAQ) has reviewed an application from Bison Manufacturing, Inc. relating to the operation of a livestock trailer superstructure manufacturing source.

#### **History**

Bison Manufacturing, Inc. was issued a Part 70 Operating Permit (T 039-7367-00081) on April 15, 1999 for the operation of three (3) spray coating operations, one (1) assembly area for the application of adhesives and sealants, and various insignificant activities.

As part of their operating permit renewal application, received by IDEM, OAQ, on February 13, 2003, Bison Manufacturing, Inc. requested to change their operating permit status from a Part 70 Operating Permit to a Minor Source Operation Permit (MSOP). This request is the result of the source deciding to use more environmentally friendly compounds and also to reduce the maximum production capacity of the livestock trailer superstructures. These changes to the source result in an unrestricted potential to emit of PM<sub>10</sub> and VOC from the entire source of less than one (100) tons per year which is less than the Part 70 and FESOP thresholds. Furthermore, the unrestricted potential to emit of NO<sub>x</sub>, CO, and SO<sub>2</sub>, from the entire source will remain at less than one hundred (100) tons per year each. The potential to emit a single HAP from the entire source has been reduced to less than ten (10) tons per year and the potential to emit for any combination of HAPs has subsequently been reduced to less than twenty-five (25) tons per year, which is also below Part 70 and FESOP thresholds. As a result, IDEM, OAQ, agrees that Bison Manufacturing, Inc.'s request to change to a Minor Source Operating Permit (MSOP) is appropriate and the Part 70 Operating Permit (T 039-7367-00081) will be revoked upon issuance of this MSOP.

#### **Permitted Emission Units and Pollution Control Equipment**

The source consists of the following permitted emission units and pollution control devices:

- (a) Three (3) surface coating operations, two (2) identified as Old Paint Room and one (1) identified as New Paint Room, equipped with dry filters for particulate control and high volume low pressure (HVLP) and airless spray guns, exhausting to Stacks OPR 1, OPR 2 and NPR, capacity: thirty-five (35) metal trailer superstructures per week (0.2083 super-

structures per hour), total.

- (b) One (1) assembly area, identified as A1, equipped with extrusion guns used for application of sealants and adhesives, exhausting to the general ventilation system, capacity: thirty-five (35) painted metal trailer superstructures per week (0.2083 superstructures per hour).

The source also consists of the following emission units that were considered insignificant activities in previous approvals:

- (c) One (1) petroleum fuel (#2 Distillate) storage tank, identified as #2 Tank, constructed in 2003, capacity: two hundred and fifty (250) gallons.
- (d) One (1) gasoline storage tank, identified as Gas 1, constructed in 1992, capacity: two hundred and fifty (250) gallons.
- (e) Source-wide natural gas-fired combustion units rated at 2.975 million British thermal units per hour, consisting of:
  - (1) Thirteen (13) space heaters, constructed in 1992, rated at 0.075 million British thermal units per hour, each.
  - (2) One (1) forced air unit, constructed in 1998, rated at 0.100 million British thermal units per hour.
  - (3) One (1) air make up unit, constructed in 1992, rated at 1.90 million British thermal units per hour.
- (f) One (1) sawing, shearing and bending facility identified as FAB 1, using cutting coolant.
- (g) Twenty (20) Metal Inert Gas (MIG) welding stations, identified as Weld 1, capacity: 1.46 pounds of wire per station.
- (h) Paved and unpaved roads and parking lots with public access.

#### **Unpermitted Emission Units and Pollution Control Equipment**

There are no unpermitted facilities operating at this source during this review process.

#### **New Emission Units and Pollution Control Equipment**

There are no new facilities proposed at this source during this review process.

#### **Existing Approvals**

The source has been operating under the following previous approvals including:

- (a) T 039-7367-00081, issued on April 15, 1999;
- (b) AA 039-12131-00081, issued on April 27, 2000; and
- (c) R 039-13213-00081, issued on November 1, 2001.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded by this permit.

### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
OPR 1	Surface Coating	20	3.33	22,000	Ambient
OPR 2	Surface Coating	20	3.33	22,000	Ambient
NPR	Surface Coating	20	3.33	22,000	Ambient

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on February 13, 2003, with additional information received on May 12, 2003.

### Emission Calculations

See Appendix A, pages 1 through 6 of 6, of this document for detailed emissions calculations. According to the source, there are no emissions associated with the sawing, bending and shearing facility since the use of a liquid coolant is integral to these operations.

### Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	12.7
PM <sub>10</sub>	12.8
SO <sub>2</sub>	0.008
VOC	32.6

Pollutant	Potential To Emit (tons/year)
CO	1.09
NO <sub>x</sub>	1.30

HAPs	Potential To Emit (tons/year)
Manganese Compounds	0.004
Chromium Compounds	0.001
Toluene	7.01
Xylene	0.078
Benzene	0.00003
Dichlorobenzene	0.00002
Formaldehyde	0.001
Hexane	0.023
Lead Compounds	0.00001
Methyl Alcohol	0.947
MEK	0.947
MIBK	0.947
Cadmium Compounds	0.00001
Nickel Compounds	0.00003
Ethyl Benzene	0.012
TOTAL	9.97

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of VOC is equal to or greater than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-6.1.
- (b) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

#### Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data.

Pollutant	Actual Emissions (tons/year)
PM	-
PM <sub>10</sub>	0.00
SO <sub>2</sub>	-
VOC	20.0
CO	-
NO <sub>x</sub>	-
HAP	-

### Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM <sub>10</sub>	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Surface Coating	1.44	1.44	-	20.8	-	-	0.083
Assembly	0.005	0.005	-	11.7	-	-	9.86
Natural Gas Combustion	0.025	0.099	0.008	0.072	1.09	1.30	0.024
Welding	3.08	3.08	-	-	-	-	0.006
Total Emissions	4.55	4.62	0.008	32.6	1.09	1.30	9.97

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM <sub>10</sub>	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as maintenance attainment for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (b) Elkhart County has been classified as attainment for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.
- (c) Fugitive Emissions  
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, and 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

#### **Part 70 Permit Determination**

##### **326 IAC 2-7 (Part 70 Permit Program)**

This existing source, including the emissions from this permit MSOP 039-16808-00081, is no longer subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than one hundred (100) tons per year,
- (b) a single hazardous air pollutant (HAP) is less than ten (10) tons per year, and
- (c) any combination of HAPs is less than twenty-five (25) tons per year.

This status is based on the emissions calculations in Appendix A. This status has been verified by the OAQ inspector assigned to the source.

#### **Federal Rule Applicability**

- (a) The fuel oil and gasoline storage tanks, constructed in 2003 and 1992, are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because the storage tanks each have a capacity less than forty (40) cubic meters which is equal to 10,566.8 gallons.
- (b) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source because the source is not a major source of hazardous air pollutant (HAP) emissions (i.e., the source does not have the potential to emit ten (10) tons per year or greater of a single HAP or twenty-five (25) tons per year or greater of a combination of HAPs).

#### **State Rule Applicability - Entire Source**

##### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD))**

This source emits less than 250 tons per year of any pollutant and it is not one of the 28 sources listed under 326 IAC 2-2. Therefore, the requirements of 326 IAC 2-2 do not apply.

#### 326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit of any single HAP from the entire source is less than ten (10) tons per year and the potential emit of any combination of HAPs from the entire source is less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2.4.1-1 do not apply to this source.

#### 326 IAC 2-6 (Emission Reporting)

Pursuant to 326 IAC 2-6 (Emission Reporting), this source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compounds (VOCs) in Elkhart County. Pursuant to this rule, the permittee must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

#### 326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

#### 326 IAC 6-4 (Fugitive Dust Emissions Limitations)

This rule requires the source not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

### **State Rule Applicability - Individual Facilities**

#### 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes)

Pursuant to 326 IAC 6-3-2(d), particulate from the surface coating line shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the permittee shall operate the control device in accordance with manufacturer's specifications. Compliance with this rule is shown by the use of dry filters for overspray control.

#### 326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray booths (OPR 1, OPR 2 and NPR) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations shown on page 1 of 6 of Appendix A, the paint rooms are in compliance with this requirement, with a daily volume weighted average of 3.5 pounds of VOC per gallon of coating, less water.

Adhesives used in the assembly area are also in compliance with this requirement because all are less than 3.5 pounds of VOC per gallon as applied. Compliance with this rule for the paint rooms shall be shown by use of the following equation to calculate daily volume weighted average:

$$A = [ 3 (C \times U) / 3 U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;  
C is the VOC content of the coating in pounds VOC per gallon less water as applied;  
and U is the usage rate of the coating in gallons per day.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The requirements of 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels) are not applicable to this source because the source is located in Elkhart County.

#### Conclusion

The operation of this livestock trailer superstructure manufacturing source shall be subject to the conditions of the attached proposed Minor Source Operating Permit 089-16808-00081.



**Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations**

Page 1 of 6 TSD App A

**Company Name: Bison Manufacturing, Inc.  
Address City IN Zip: 71913 CR 23, New Paris, Indiana 46553  
MSOP: 039-16808  
Plt ID: 039-00081  
Reviewer: Mark L. Kramer  
Date: February 13, 2003**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Paint Booths																
Part A, 3.5 Poly Paint	8.77	39.8%	0.00%	39.8%	0.00%	60.2%	2.55	0.2083	3.49	3.49	1.85	44	8.1	3.1	5.80	75.0%
Part B, 3.5 Paint Activator	8.23	43.0%	0.00%	43.0%	0.00%	57.0%	0.850	0.2083	3.54	3.54	0.63	15.0	2.74	0.91	6.21	75.0%
Part A, Primer	12.31	27.7%	0.00%	27.7%	0.00%	72.3%	2.55	0.2083	3.41	3.41	1.81	43	7.9	5.2	4.72	75.0%
Part B, Primer Activator	8.36	42.7%	0.00%	42.7%	0.00%	57.3%	0.430	0.2083	3.57	3.57	0.320	7.7	1.40	0.47	6.23	75.0%
D-150	7.48	100%	0.00%	100%	0.00%	0.00%	0.030	0.2083	7.48	7.48	0.047	1.12	0.205	0.00	N/A	75.0%
Xylol	7.25	100%	0.00%	100%	0.00%	0.00%	0.010	0.2083	7.25	7.25	0.015	0.362	0.066	0.00	N/A	75.0%
PM Acetate	8.01	100%	0.00%	100%	0.00%	0.00%	0.030	0.2083	8.01	8.01	0.050	1.20	0.219	0.00	N/A	75.0%
Polyurethane Reducer	7.82	100%	0.00%	100%	0.00%	0.00%	0.010	0.2083	7.82	7.82	0.016	0.391	0.071	0.00	N/A	75.0%

<b>Potential to Emit</b>	<b>Add worst case coating to all solvents</b>	PM	Control Efficiency	85.0%
			<b>Uncontrolled</b>	
				<b>4.7</b>
			<b>Controlled</b>	
				<b>4.7</b>

<b>4.7</b>	<b>114</b>	<b>20.8</b>	<b>9.63</b>
<b>4.7</b>	<b>114</b>	<b>20.8</b>	<b>1.44</b>

**Volume Weighted VOC Content of the Coatings Used**

$$A = \frac{C \times U \text{ (summed for all coatings)}}{U \text{ (summed for all coatings)}}$$

A = The volume weighted average in pounds VOC per gallon less water as applied  
C = The VOC content of the coating in pounds VOC per gallon less water as applied  
U = The usage rate of the coating in gallons per day

$$A = \frac{106\text{lbs/day(Part A, 3.5 Poly Paint)} + 36.1\text{lbs/day(Part B, 3.5 Paint Activator)} + 104\text{lbs/day(Part A, Primer)} + 18.4\text{lbs/day(Part B, Primer Activator)} + 2.69\text{lbs/day(D-150)} + 0.87\text{lbs/day(Xylol)} + 2.88\text{lbs/day (PM Acetate)} + 0.938\text{lbs/day(Poly Reducer)}}{30.6\text{gal/day(Part A, 3.5 Poly Paint)} + 10.2\text{gal/day(Part B, 3.5 Paint Activator)} + 30.6\text{gal/day(Part A, Primer)} + 5.16\text{gal/day(Part B, Primer Activator)} + 0.36\text{lbs/day(D-150)} + 0.12\text{lbs/day(Xylol)} + 0.36\text{lbs/day(PM Acetate)} + 0.12\text{lbs/day(Poly Reducer)}}$$

$$A = \frac{269\text{lbs/day}}{77.5\text{gal/day}}$$

$$A = 3.47\text{lbs/gal}$$

All parameters are taken from calculations found in above spreadsheet.

**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used

**Appendix A: Emissions Calculations  
VOC and Particulate  
From Assembly Operations**

Page 2 of 6 TSD App A

**Company Name: Bison Manufacturing, Inc.  
Address City IN Zip: 71913 CR 23, New Paris, Indiana 46553  
MSOP: 039-16808  
Pit ID: 039-00081  
Reviewer: Mark L. Kramer  
Date: February 13, 2003**

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency
Assembly																
Permathane Polyurethane Sealant	13.32	3.00%	0.00%	3.00%	0.00%	97.0%	0.123	0.2083	0.400	0.400	0.010	0.246	0.045	0.00	0.412	100%
NuFlex 302 Gen. Purpose Silicone Sealant	8.58	3.10%	0.00%	3.10%	0.00%	96.9%	0.385	0.2083	0.266	0.266	0.021	0.512	0.093	0.00	0.274	100%
SC-0299-773 Adhesive	9.60	28.0%	0.00%	28.0%	0.00%	72.0%	0.078	0.2083	2.69	2.69	0.044	1.05	0.191	0.00	3.73	100%
SM 5504 Seam Sealer	8.25	42.45%	0.00%	42.5%	0.00%	57.55%	0.390	0.2083	3.50	3.50	0.285	6.83	1.25	0.00	6.09	100%
Grundylastic Adhesive	7.50	30.0%	0.00%	30.0%	0.00%	65.0%	0.319	0.2083	2.25	2.25	0.150	3.59	0.655	0.00	3.46	100%
Lacquer Thinner (Cleaning Solvent)	7.00	100%	0.00%	100%	0.00%	0.00%	1.483	0.2083	7.00	7.00	2.16	51.9	9.47	0.00	N/A	100%
Simple Green	8.54	98.14%	97.34%	0.800%	97.34%	1.86%	0.125	0.2083	2.57	0.068	0.002	0.043	0.008	0.005	3.67	75.0%

<b>Potential to Emit</b>	<b>Add worst case coating to all solvents</b>	<b>Uncontrolled</b>	<b>2.67</b>	<b>64.2</b>	<b>11.7</b>	<b>0.005</b>
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**METHODOLOGY**

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) \* Weight % Organics) / (1-Volume % water)  
Pounds of VOC per Gallon Coating = (Density (lbs/gal) \* Weight % Organics)  
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr)  
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (24 hr/day)  
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) \* Gal of Material (gal/unit) \* Maximum (units/hr) \* (8760 hr/yr) \* (1 ton/2000 lbs)  
Particulate Potential Tons per Year = (units/hour) \* (gal/unit) \* (lbs/gal) \* (1- Weight % Volatiles) \* (1-Transfer efficiency) \*(8760 hrs/yr) \*(1 ton/2000 lbs)  
Pounds VOC per Gallon of Solids = (Density (lbs/gal) \* Weight % organics) / (Volume % solids)  
Total = Worst Coating + Sum of all solvents used



# Appendix A: Welding and Thermal Cutting

Page 4 of 6 TSD App A

Company Name: **Bison Manufacturing, Inc.**  
Address City IN Zip: **71913 CR 23, New Paris, Indiana 46553**  
MSOP: **039-16808**  
Plt ID: **039-00081**  
Reviewer: **Mark L. Kramer**  
Date: **February 13, 2003**

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)	EMISSION FACTORS * (lb pollutant / lb electrode)				EMISSIONS (lb/hr)				TOTAL HAPs (lb/hr)
			PM = PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
WELDING											
Metal Inert Gas (MIG)(ER5154)	20.0	1.46	0.024	0.00003		0.00001	0.704	0.001	0.00	0.0003	0.001
EMISSION TOTALS							PM = PM10	Mn	Ni	Cr	Total HAPs
Potential Emissions lbs/hr							0.704	0.001	0.00	0.0003	0.001
Potential Emissions lbs/day							16.9	0.024	0.00	0.007	0.031
Potential Emissions tons/year							3.08	0.004	0.00	0.001	0.006

## METHODOLOGY

\*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column. Consult AP-42 or other reference for different electrode types.

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/day x 1 ton/2,000 lbs.

Plasma cutting emission factors are from the American Welding Society study published in Sweden (March 1994).

Welding and other flame cutting emission factors are from an internal training session document.

See AP-42, Chapter 12.19 for additional emission factors for welding.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100**

**Company Name: Bison Manufacturing, Inc.  
Address City IN Zip: 71913 CR 23, New Paris, Indiana 46553  
MSOP: 039-16808  
Plt ID: 039-00081  
Reviewer: Mark L. Kramer  
Date: February 13, 2003**

Heat Input Capacity  
MMBtu/hr

Potential Throughput  
MMCF/yr

Thirteen (13) space heaters rated at 0.075 MMBtu/hr, each.  
One (1) forced air unit rated at 0.100 MMBtu/hr.  
One (1) air make up unit rated at 1.90 MMBtu/hr.

2.975

26.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100	5.50	84.0
				**see below		
Potential Emission in tons/yr	0.025	0.099	0.008	1.30	0.072	1.09

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

### Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03  
(SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 6 for HAPs emissions calculations.

**Appendix A: Emissions Calculations  
Natural Gas Combustion Only  
MM BTU/HR <100  
HAPs Emissions**

**Page 6 of 6 TSD App A**

**Company Name: Bison Manufacturing, Inc.  
Address City IN Zip: 71913 CR 23, New Paris, Indiana 46553  
MSOP: 039-16808  
Plt ID: 039-00081  
Reviewer: Mark L. Kramer  
Date: February 13, 2003**

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 0.002	Dichlorobenzene 0.001	Formaldehyde 0.075	Hexane 1.80	Toluene 0.003
Potential Emission in tons/yr	0.00003	0.00002	0.001	0.023	0.00004

HAPs - Metals

Emission Factor in lb/MMcf	Lead 0.0005	Cadmium 0.001	Chromium 0.001	Manganese 0.0004	Nickel 0.002	Total HAPs
Potential Emission in tons/yr	0.00001	0.00001	0.00002	0.000005	0.00003	0.025

Methodology is the same as page 5.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.